

**21-MJ-1393-DLC**

**AFFIDAVIT OF SPECIAL AGENT MATTHEW R. ZAREMBA**

I, Special Agent Matthew R. Zaremba, being duly sworn, depose and state that:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. I am a federal law enforcement officer within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General.

2. I have been a Special Agent with the FBI since 2006. I am currently assigned to the Boston Field Office, Lowell Resident Agency. I am assigned to work Counterterrorism and Criminal matters to include investigations focused on transnational organized crime, threats to life, violent gangs, drug trafficking, and violent crimes against children. Prior to my current assignment I was assigned to FBI Headquarters where I worked joint overseas investigations related to threats against the United States to include kidnappings, murders, terrorist plots and attacks. I have also worked on a Combined Joint Interagency Task Force, served as an Assistant Legal Attaché in South Africa, and worked on the FBI's Joint Terrorism Task Force in Boston, MA.

3. As an FBI Special Agent, I am authorized to investigate violations of the laws of the United States, including violations of federal narcotics laws in Title 21 of the United States Code and federal firearms laws in Title 18 of the United States Code. During my law enforcement career, I have received specialized training regarding the activities of narcotics traffickers, including the methods used to package, store, and distribute narcotics, and the methods used by narcotics traffickers to conceal and launder the proceeds of their narcotics trafficking activities and the use of firearms in their activities.

4. I am familiar with the manner and means commonly employed by drug traffickers, including those employed to avoid detection by law enforcement. I am also familiar with the terminology and slang commonly employed by drug traffickers. In my training and experience, I have observed and examined cocaine, cocaine base (“crack”), heroin, fentanyl, oxycodone, methamphetamine, and other controlled substances. I am aware of the prices commonly charged on the street for these substances, the method of packaging, and the street terms used in their trade.

5. I have participated in various aspects of drug-related investigations. I have participated in controlled purchases of controlled substances utilizing confidential sources and undercover law enforcement agents and officers. I have prepared affidavits in support of applications for criminal complaints, search warrants, and/or arrest warrants. I have also conducted and coordinated electronic and physical surveillance of individuals involved in the illegal distribution of controlled substances.

6. Based on my training and experience, I am familiar with the methods of operation employed by drug traffickers operating at the local, statewide, national and international levels, including those involving the distribution, storage, and transportation of controlled substances and the collection of money that constitutes the proceeds of drug-trafficking activities. Specifically, I am familiar with the manner in which drug traffickers use vehicles, common carriers, mail and private delivery services, and a variety of other means to transport and distribute narcotics and the proceeds of narcotics trafficking. I am familiar with the manner in which drug traffickers often store drugs and drug proceeds in storage sites commonly referred to as “stash houses.” I also am familiar with the manner in which drug traffickers use telephones, coded or slang-filled conversations, text messages, pager messages,

and other means to facilitate their illegal activities. I am familiar with the manner in which narcotics traffickers use telephone, coded, or slang-filled conversations when discussing their illegal business, in an effort to further prevent detection. I am familiar with the street terms used by drug traffickers, as well as the methods they use to disguise conversation and operations. I am also familiar with the practice of drug traffickers of using firearms to protect their drug business including their stash of narcotics and money from proceeds.

7. Based on my training and experience as an FBI Special Agent, I am familiar with federal firearms and narcotics laws and know that it is a violation of Title 18, U.S.C., Section 922(g)(1) to knowing that they were a felon, be in possession of a firearm and ammunition that has previously traveled in interstate commerce.

## **II. PURPOSE OF AFFIDAVIT**

8. I am familiar with the facts and circumstances of this investigation based upon: (a) my personal knowledge and involvement in this investigation; (b) my review of records related to this investigation; (c) information provided to me orally and in writing by other law enforcement agents; and (d) my experience and training as a criminal investigator.

9. Because this affidavit is submitted for the limited purpose of establishing probable cause supporting that the crime of being a felon in possession of a firearm and ammunition was committed, I have not included each and every fact known to me or other law enforcement officers involved in this investigation. Rather, I have included only those facts that I believe are sufficient to establish probable cause for the issuance of the requested complaint and arrest warrant. All times herein are approximate.

### III. THE INVESTIGATION

10. Based on the investigation, described herein, there is probable cause to believe that, **Barndol SUONG**, a/k/a “Tall,”<sup>1</sup> knowing that he was a convicted felon, unlawfully possessed a firearm and ammunition, in violation of 18 U.S.C. § 922(g)(1).

11. Since August 2018, the FBI, Lowell Resident Agency (RA) and Lowell Police Department have been engaged in an investigation into the One Family Clique (“OFC”), which is an alliance of several local gangs primarily based out of Lowell, Massachusetts, which includes Crazy Mob Family, Crazy Brother Clan, the Outlaws, Insane Blood Gang, Ruthless Cambodian Bloods, Moonlight Strangers, Dangerous Little Bloods, Original Bloods, Diamond Crips, and Sworn Brothers.<sup>2</sup> OFC is an association of primarily Asian gangs but also has alliances of convenience with other non-Asian gang members.

12. Members and associates of OFC are engaged in illegal drug and firearm trafficking, robbery, and acts of violence against rival gang members and associates. In particular, their cocaine, heroin, fentanyl and marijuana trafficking operations span the Lowell metropolitan area and throughout eastern Massachusetts. The CMF's drug trafficking activities are also suspected to have ties to Atlanta, Georgia; New York City, New York; Miami, Florida; Philadelphia, Pennsylvania; Richmond, Virginia; and California.

13. On June 10, 2021, agents proceeded to the address of residence of **SUONG** at 71 Corbett Street, Lowell, Massachusetts to execute a search warrant issued by Magistrate Judge Donald L. Cabell, 21-MJ-1255-DLC, that authorized the search of the premises for evidence

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<sup>1</sup> SUONG is a member of OFC/CBC.

<sup>2</sup> Members of these historically rival gangs have been observed by Lowell Police Department associating with each other. These connections are often due to familial relationships and a shared cultural background.

related to drug trafficking and money laundering activities. Agents involved in the investigation were aware of the prior criminal record of **SUONG** that rendered him a prohibited person, thereby preventing him from lawfully possessing a firearm and ammunition.

14. At approximately 5:00 a.m., the FBI entry team proceeded to the premises and called **SUONG** to depart from the residence so that the search warrant could be executed. There were numerous other parties in the residence at that time.

15. **SUONG** complied, exiting the residence through a side doorway. He was detained while the residence was safely cleared of persons.

16. The search team then entered the residence and commenced the search pursuant to the search warrant. Agents went into a bedroom that they believed to be **SUONG's** bedroom and searched for evidence. The bedroom contained photographs on the wall depicting **SUONG**, along with his wife and children.

17. The agents searched a dresser in the bedroom that was a short distance from the bed and located a Taurus revolver, serial number FS619932 in the top drawer of the dresser.



18. The gun was not loaded. There were five rounds of ammunition stored in a rubber glove and found in the same drawer next to the gun. Agents also located **SUONG's** driver's license, and social security cards for him and his family, on a night stand next to same

dresser that the gun was located in.

19. The gun had markings describing that Taurus Int. Mfg., was located on Miami, FL, and also that the gun was “Made in Brazil.”



20. Agents also located fifteen additional rounds of ammunition in the bottom left drawer of the same dresser that appeared to be the same type of ammunition as the five rounds of ammunition recovered next the firearm in the top drawer of the dresser.

21. Based on my training and experience in firearms, consultation with agents, and the markings on it, the firearm identified above was manufactured outside of Massachusetts, and, thus, had to travel in interstate commerce to be possessed by **SUONG** in Massachusetts. Further, based upon my observations, I believe that the Taurus revolver meets the federal definition of a firearm.

22. I am also aware that no commercial ammunition is manufactured in the state of Massachusetts. Therefore, I believe that the total of twenty rounds of ammunition recovered on June 10, 2021, also meet the federal definition of ammunition, necessarily crossed state lines prior to being recovered in Lowell, MA.

23. Based upon a review of public records, I am aware that **SUONG** has knowledge that he has been convicted of criminal charges out of the Middlesex Superior Court for which the possible sentence would (and did) exceed one year. Namely, in or about 2008, **SUONG** was convicted and received a sentence of 18 months imprisonment for unlawful possession of a firearm. Additionally, in or about 2008, **SUONG** was convicted and received a sentence of 2 ½ to 3 years imprisonment on a charge of Assault and Battery with a Dangerous Weapon, a handgun. I know from my training and experience that these offenses are felonies and meet the definition of “crime punishable by imprisonment for a term exceeding one year” as set forth at 18 U.S.C. § 921(a)(20). Therefore, **SUONG** knew at the time of his possession of the firearm and ammunition charged here, that he had been previously convicted of a crime punishable by a term exceeding one year.

24. **SUONG** was placed under arrest at his residence in Lowell on the federal charge




of being a felon in possession of a firearm and ammunition.

**CONCLUSION**


25. Based on the information described above, there is probable cause to believe that **SUONG**, knowing that he was previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm and ammunition, that is: a Taurus revolver, serial number FS619932, and twenty rounds of ammunition.

26. I respectfully request that the Court issue a criminal complaint charging **SUONG** with being a felon in possession of a firearm and ammunition, in violation of 18 U.S.C. § 922(g)(1).

Sworn to under the pains and penalties of perjury,

  
Matthew R. Zaremba  
Special Agent  
Federal Bureau of Investigation

Signed electronically and sworn to by teleconference on June 10, 2021,

  
DONALD L. CABELL  
United States Magistrate Judge

